

LAMONICA HERBST & MANISCALCO, LLP

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October 11, 2019

Via ECF & E-Mail (Garrity.chambers@nysb.uscourts.gov)

Honorable James L. Garrity, Jr.
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

**Re: Penny Ann Bradley
Chapter 11
Case No. 18-10122 (JLG)**

Dear Judge Garrity:

This firm is special counsel to Penny Ann Bradley (the “Debtor”).

There are currently scheduled for a hearing on November 6, 2019 the following matters:

- (i) Case Status Conference;
- (ii) The Motion of NSM82 LLC to Appoint a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104(a) [Dkt. No. 131];
- (iii) The Motion of Lewis H. Berman LLC to Appoint a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104(a) [Dkt. No. 167];
- (iv) The Debtor’s Objection to Proof of Claim Number 3 Filed by Atlas Union Corp. [Dkt. No. 172];
- (v) The Debtor’s Objection to Proof of Claim Number 6 Filed by Russell and Lydia Pollack [Dkt. No 183]; and
- (vi) The United States Trustee’s Motion to Convert This Case to a Case Under Chapter 7 [Dkt. No. 185].

As a result of personal scheduling conflicts for myself—my daughter’s confirmation—and my partner, Gary Herbst—a scheduled trip to visit family out of the country—I requested, and each party in interest consented, to the adjournment of all matters currently scheduled for November 6, 2019. All parties have indicated their consent and availability on November 20, 2019 in the afternoon. Accordingly, we respectfully request that the Court adjourn all scheduled matters from November 6, 2019 to November 20, 2019 at 2:30, if the Court is available at that date and time, or the earliest date thereafter at which the Court is available.

Thank you for your consideration.

Respectfully submitted,
Joseph S. Maniscalco, Esq.
Joseph S. Maniscalco

cc: Nolan E. Shanahan, Esq.; Jacob S. Frumkin, Esq.; Daniel S. Alter, Esq.; Serene K. Nakano, Esq.; Kenneth Baum, Esq.; David Hartheimer, Esq.’ Richard Levy, Esq.’ Sandy Mayerson, Esq.; Marion R. Harris, Esq.